

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION**

BEEQB, LLC, a Florida corporation,

Plaintiff,

v.

BLOCKQUARRY CORP. f/k/a ISW HOLDINGS, INC., a Nevada corporation, and PANTHEON RESOURCES, INC.,

Defendants.

CIVIL ACTION NO. 7:24-CV-03179-TMC

**DEFENDANT PANTHEON RESOURCES, INC'S  
RESPONSES TO LOCAL RULE 26.01 INTERROGATORIES**

Defendant Pantheon Resources, Inc. ("Pantheon") hereby responds to the Local Rule 26.01 Interrogatories as follows:

**INTERROGATORY (A):** State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**RESPONSE:** Pantheon is not aware of any person or legal entity with a subrogation interest in this action.

**INTERROGATORY (B):** As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE:** In the Complaint, Plaintiff has demanded a jury trial for its claims.

**INTERROGATORY (C):** State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned

company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**RESPONSE: Pantheon is a privately held corporation.**

INTERROGATORY (D): State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

**RESPONSE: The United States District Court for the District of South Carolina, Spartanburg Division is the proper division for this action pursuant to the FRCP and applicable Local Rules.**

INTERROGATORY (E): Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE: No.**

INTERROGATORY (F): If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**RESPONSE: N/A as to Pantheon.**

**INTERROGATORY (G):** If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**RESPONSE:** N/A as to Pantheon.

**INTERROGATORY (H): Parties or Intervenors in a Diversity Case.** In an action in which jurisdiction is based on diversity under 28 U.S.C. §1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later even occurs that could affect the court’s jurisdiction under §1332(a).

**RESPONSE:** Pantheon is a Delaware corporation with its physical operations currently headquartered in the State of Missouri with management team spread out over numerous states and territories outside the United States.

This 29<sup>th</sup> day of August, 2024.

Respectfully submitted,

*/s/ Trent M. Grissom*  
Trent M. Grissom (Fed. Bar No. 10671)  
**McGrath & Spielberger, PLLC**  
6201 Fairview Rd., Suite #330  
Charlotte, NC 28210  
*Attorney for Defendant Pantheon Resources*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 29, 2024, I caused the foregoing Defendant Pantheon Resources Inc.'s Responses to Local Rule 26.01 Interrogatories to be filed via CM/ECF which will provide notice of its filing to:

Graham L. Newman  
**Chappell, Chappell, & Newman**  
4500 Fort Jackson Blvd., Suite 250  
Columbia, SC 29209  
[graham@chappell.law](mailto:graham@chappell.law)  
*Attorneys for Plaintiff*

Andrew A. Mathias  
**Maynard Nexsen**  
104 South Main Street, Suite 900  
Greenville, SC 29601  
[amathias@maynardnexsen.com](mailto:amathias@maynardnexsen.com)  
*Attorneys for Defendant Blockquarry Corp.*

/s/ Trent M. Grissom  
Trent M. Grissom (Fed. Bar No. 10671)